

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF RHODE ISLAND

MARY SEGUIN, *pro se*
Plaintiff

v.

RHODE ISLAND OFFICE OF CHILD
SUPPORT SERVICES; *Et al.*,
Defendants

C.A. No. 23-cv-00034-WES-PAS

**MOTION FOR ENLARGEMENT OF TIME TO ANSWER OR OTHERWISE
RESPOND TO THE AMENDED COMPLAINT (ECF 12)**

NOW COME the Defendants Rhode Island Department of Human Services and Rhode Island Office of Child Support Services, (“State Defendants”) and hereby move for an enlargement of time to answer or otherwise respond to the Amended Complaint (ECF 1), filed by Plaintiff Mary Seguin, *pro se* (“Plaintiff”). As grounds thereof, State Defendants assert as follows:

1. The Complaint spans one hundred four (104) pages and over two hundred twenty-five (225) paragraphs in length and contains nineteen (19) counts.
2. The subject matter of the Complaint concerns child support arrears, consisting largely of unpaid interest, owed by Seguin in connection with an ongoing Rhode Island Family Court proceeding. *See Meyersiek v. Seguin*, C.A. No. K20010521M (R.I. Family Ct. *filed* May 21, 2001).
3. On February 10, 2023, the Rhode Island Family Court heard oral arguments from Seguin and OCSS on the child support arrears that Seguin challenges in the Amended Complaint. *See id.*

4. Following the hearing, the Rhode Island Family Court found significant arrears owed by Seguin but continued the matter to allow Seguin the opportunity to further dispute those arrears. The proposed order filed with the Rhode Island Family Court is attached hereto as ***Exhibit A***.
5. Several hearings have occurred in the Rhode Island Family Court proceeding. The next hearing in the matter is scheduled for August 18, 2023.
6. In light of the ongoing Rhode Island Family Court proceeding, an enlargement of time is in the interests of judicial economy.
7. An enlargement of time is further needed to parse through Plaintiff's 104 page, 19count Complaint and respond in a manner that is both meaningful and that advances this litigation in the most judicially economic manner possible.
8. The undersigned counsel asserts that an enlargement of time is further necessary because of professional obligations in other matters pending in federal and state courts.
9. This is State Defendants' **First Request** for an enlargement of time to answer or otherwise respond to the Complaint (ECF 1).

WHEREFORE, State Defendants respectfully request that this Honorable Court grant the instant Motion and enlarge the time for State Defendants to answer or otherwise respond by sixty (60) days, up to and including October 9, 2023.¹

¹ Sixty (60) days from August 9 is Sunday, October 8, 2023. Per F.R.C.P. 6 (1)(a), if a last day of the period is to be included is a Sunday, the event period runs until the end of the next day which is neither a Saturday, Sunday, nor a holiday.

Respectfully Submitted,

**RHODE ISLAND DEPARTMENT
OF HUMAN SERVICES; RHODE
ISLAND OFFICE OF CHILD
SUPPORT SERVICES,**

By:

**PETER F. NERONHA
ATTORNEY GENERAL**

/s/ Marissa D. Pizaña
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CERTIFICATE OF SERVICE

I hereby certify that on August 7, 2023, I filed the within document via the ECF filing system and that a copy is available for viewing and downloading.

/s/ Marissa D. Pizaña